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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHRISTOPHER VANGEMERT,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00657-JCM-NJK

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO PLAINTIFF'S
MOTION FOR REMAND**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended from August 20, 2018 to **October 4, 2018**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel had three deaths in her family in June, July and now August, as well as a family medical emergency of an immediate family member. As such, Counsel has been out on leave to attend to the several funeral and prayer services and expects to take additional bereavement leave for the recent family death. In addition, Counsel also has over 85+ pending social security cases, which require two or more dispositive motions a week until mid-September, a pending

1 Ninth Circuit matter, and several non-litigation civil rights and representative misconduct matters that
2 require prompt attention and investigation. Counsel is also expected to be on vacation leave during the
3 last week of September. Due to current workload demands and unanticipated and upcoming leave,
4 Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's
5 Motion for Remand. Defendant makes this request in good faith with no intention to unduly delay the
6 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
7 accordingly.
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10 Respectfully submitted,

11 Dated: August 17, 2018

/s/ *Joshua Harris
(*as authorized by email on August 17, 2018)
JOSHUA HARRIS
Attorney for Plaintiff

14 Dated: August 17, 2018

DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

17 By /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant U.S. Attorney
Attorneys for Defendant

20
21 **ORDER**

22 APPROVED AND SO ORDERED:

23 DATED: August 20, 2018

24 
Nancy J. Koppe
25 United States Magistrate Judge
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